

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Division

Jeffrey Michael Slama Hastings

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

see attached (Attachment #1)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ No

FILED BY [Signature] D.C.

NOV 07 2023

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - W.P.B.

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Jeffrey Michael Stama Hastings

Address

8862 Estate dr.

West Palm Beach

FL.

33411

City

State

Zip Code

County

Palm Beach County

Telephone Number

561 541 1698

E-Mail Address

notplbso@proton.me

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

The Palm Beach County Sheriffs Office

Job or Title (if known)

Address

3225 gun club rd.

West Palm Beach

FL.

33406

City

State

Zip Code

County

Palm Beach County

Telephone Number

561 688 3000

E-Mail Address (if known)

☐ Individual capacity
 ☒ Official capacity

Defendant No. 2

Name

Ric Bradshaw

Job or Title (if known)

Sheriff

Address

3225 gun club rd.

West Palm Beach

FL.

33406

City

State

Zip Code

County

Palm Beach County

Telephone Number

561 688 3000

E-Mail Address (if known)

☐ Individual capacity
 ☒ Official capacity

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Defendant No. 3

Name

Mary Hansen

Job or Title (if known)

Detective

Address

3228 gun club rd.

West Palm Beach

FL.

33406

City

State

Zip Code

County

Palm Beach County

Telephone Number

561 688 3000

E-Mail Address (if known)

☐

Individual capacity

☒

Official capacity

Defendant No. 4

Name

Valreen Vennar

Job or Title (if known)

deputy

Address

3228 gun club rd.

West Palm Beach

FL.

33406

City

State

Zip Code

County

Palm Beach County

Telephone Number

561 688 3000

E-Mail Address (if known)

☐

Individual capacity

☒

Official capacity

II. Basis for Jurisdiction

See Attached Defendants 5, 6, and 7
Attachment 1A

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐Federal officials (a *Bivens* claim)☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

4th 6th 8th 9th 14th Amendment

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

detective Mary Hansen was conducting a investigation into theft at my buisness. D/S Vennar was conducting a seprate investigation into me on Sept. 10th 2022. D/S Taylor and Sgt. Tatum were called as back up. D/S Vennar also took a report for det. Hansens investigation. Sheriff Ric Bradshaw is running the whole operation. Sgt Ugate was responding to a call and conducting a investigation as well.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

10100 W. Atlantic ave. Delray beach 9463, 9399 155th lane S.
3228 gun club rd. W.P.B.
8750 156th ct. S. Delray Beach
9656 happy hollow rd. Delray Beach

- B. What date and approximate time did the events giving rise to your claim(s) occur? mid-day Sept 10th 2022 - february 2022 - Sept. 10th 2022 to Jan 5th 2023 - Aug 8th 2020 to current. January 25th 2022

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

see attachment 2 and 2A

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IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

See attachment 3

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

See attachment 4A

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

11, 6, 2023

Signature of Plaintiff

Printed Name of Plaintiff

Jeffrey HastingsJeffrey Michael Slama Hastings**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

List of Attachments and reports

Attachment	1A	defendent	5,6, and 7
"	"	1	List of defendents
"	"	2A	statement of claim
"	"	2	statement of claim
"	"	3	injuies
"	"	4A	relief
"	"	5	10 page motion to Supress
"	"	6	trial transcript
"	"	7	trial transcript

Report	1	det. Mary Hansens investigation	
"	"	2	d/s vearner report on theft
"	"	3	det. Hansen report on burglary
"	"	4	det. Hansen vandalism report

Attachment 1 A

Defendent No. 5

Name Eric Tatum

Job or title Sergeant

address 3228 gun club rd.

West Palm Beach FL 33406

County Palm Beach County

phone number 561 688 3000

☒ official capacity

Defendent No. 6

Name Kari Taylor

Job or title deputy

address 3228 gun club rd.

West Palm Beach FL 33406

County Palm Beach County

phone number 561 688 3000

☒ official capacity

Defendent No. 7 Sgt. Rafeal Ugalde

Sergeant

3228 gun club rd.

West Palm Beach FL 33406

Palm Beach County

561 688 3000

☒ official capacity.

List of defendants

- 1.) The Palm Beach County Sheriff's Office
- 2.) Sheriff Ric Bradshaw
- 3.) Detective Mary Hansen
- 4.) D/S Valreen Vennar
- 5.) Sgt. Eric Tatum
- 6.) d/s. Kari Taylor
- 7.) Sgt. Rafeal Ugalde

Attachment 2A

Statement of Claim

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1.) On January 25th 2022 Benjamin Otero was on his way home from work when he recieved a call from his father about the possibility of a shooting near his nursery. Benjamin returned to delray beach and contacted the Palm Beach County Sheriff Office. Sgt. Ugalde responded followed by d/s Verner and a unnamed deputy to discuss the possibility of this shooting with Benjamin Otero who is a local buisness compeditior and very good friends with Tapia Nursery and its owner Refugio Tapia who spent years robbing and fermenting my family buisness.

2.) Benjamin told Sgt. Ugalde he belived I was involved in the shooting. Sgt Ugalde relayed this information to the other 2 deputizs, and my photo was pulled up in a data base and showed to others, this is when deputys had there target.

3.) D/S Verner admits at no time during his investigation did he connect

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me as the person who shot a gun, that was driving a truck while a gun was being shot, or as the person chasing a unknown hispanic male.

4.) The unknown hispanic male nor any other evidence was found according to d/s Vener. Who also admits Otero was assuming I was involved because I came to his nursery looking for his father shortly after this made up shooting looking for his father.

5.) Sgt Ugalde left Otero's Nursery the back way driving through my tree farm that Otero has now acquired the lease for, since this horrible incident. Sgt. Ugalde did not speak to any eye witness and the information he gathered was only from Benjamin Otero who was not even on the property when Sanchez may have heard gunshots.

6.) This is when Sgt Ugalde d/s Vener

page 3 of 9

and a unknown deputy colluded with this business competitor and friend/member of the criminal ring that have operated with impunity in this area for decades to conspire against my rights. This was done to try to put me in prison so detective hansen's useless and illegal investigation into this cabal of criminals would never be exposed by me.

7.) D/s Verner authored PCA dated January 25th and it states "Sgt. Ugalde searched Hastings truck due to investigation purposes, and found a black gum on the back floorboard in a tan colored boot."

8.) Also d/s Verner's patrol vehicle dash camera video shows Sgt. Ugalde lean into the truck in violation of my 4th Amendment right. There after open the back door of the cab

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and search the truck in complete disregard for my rights that are protected by the 4th Amendment.

9.) Deputies violated my constitutional rights to be free from unreasonable searches and seizures by illegally stopping me and illegally searching me.

10.) They had no probable cause or a reasonable suspicion that I had committed a crime or was about to, to justify this stop. Here the officers merely relied on the inarticulate hunch and assumptions of Benjamin Otero who is not even a cop he is my business competitor and friend/member of a cabal of criminals.

11.) Sgt. Ugalde needed a warrant or probable cause to lean into/ and or search my vehicle, whether the stop was legal or not. In this case the stop was not legal

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it was also a violation of my rights that are protected by the United States Constitution.

12.) As a result of this violation of my federally protected rights, I was charged with felon in possession of a firearm. and taken to the moldy jail in Palm Beach County.

13.) On January 30th 2023 I had a jury trial, I had been sitting in jail for several months awaiting because after my excessive bond was reduced and somewhat reasonable I got out of jail. However d/s Vanner is apparently very good at making very poor decisions, and proceeded to violate my federally protected rights once again in public with it being documented. This was rare because when d/s Vanner violated my federally protected rights to privacy multiple previous times he never documented it and never did it in public.

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14.) My Second encounter with d/s venner lead to me being taken to the moldy jail again with No Bond, Once again trying to prevent me from exposing The Palm Beach County Sheriffs Office and detective Mary Hansens useless and illegal investigation, which d/s venner had taken reports during which were not truthful and contained mis-leading information.

15.) At my jury trial once the enclosed motion to suppress was granted, the prosecutor finally decided to stop maliciously prosecuting me, and nolle prosequere my bogus case.

16.) On September 10th 2022 I was enjoying a beautiful and sunny day at a local park. A park in my old community in district 4 which is not free from corruption.

Sometimes when my drone would work I would fly it at the park because it wouldn't work at my

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home/business that was involved with det. Hansens useless and illegal investigation. Never could I have imagined someone I had spoke to about where we are and are not allowed to fly drones at in the park was going to call 911 in fear because I was talking to him and asked him a few questions. D/S Verner arrived and blocked the road with the caller the only road to leave the park, I started to pass them in the grass and d/s Verner started screaming at me to pull over NOW. I told d/s Verner I was scared of him and his poor behavior that I would meet him at Walwa once d/s Verner realized I was unwilling to let him violate my rights in a park where we would be alone and he could get his hands on me he agreed this was ok. Walwa at 10100 Atlantic ave. is where Sgt. Tatum and d/s ^{Taylor} ~~Verner~~ joined d/s Verner in

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using excessive force and violently throwing me on the pavement landing on me with knees in my back pinning my arms between us and the pavement making it physical impossible to comply with there outrageous and illegal orders. They wanted my arms to secure me in torture cuffs before kidnapping me in order to once again falsely imprison me in direct and blaten disregard for my rights that are protected by the United States Constitution.

17.) I tried to tell these deputys to stop, they were doing there jobs wrong. However not suprisingly they refused to listen to me.

Once they had me locked in a little box in d/s venner's car d/s venner, d/s taylor and Sgt. Tatum searched my automobile in violation of my 4th Amendment right. This is when d/s St. Cloud appeared on sight with various supervisors and surrounded the little box in d/s venner's

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car where I was awaiting
medical attention they all mocked
me and laughed at me. I think
they may have been trying to
hurt my feelings while we
awaited medical attention from
d/s/ Venner, d/s Taylor and Sgt.
Tatum beating me up. I was
then charged with driving with
a suspended DL and resisting arrest
without violence.

Attachment 2

Page 4 statement of Claim (section C.) page 1 of 7

1.) The facts underlying my claim are that on September 10th 2022 D/S Vennar illegally stopped me and illegally searched me in violation of my 4th Amendment right.

Sgt. Tatum, D/S Taylor, and D/S Vennar used excessive force while detaining me in violation of my 4th Amendment right.

2.) Due to these deputys poor decisions I had to be taken to Delray Medical Center to be treated for injuries to my arms, legs and back. Also they needed medical clearance to take me to jail illegally.

As a result of D/S Vennars repeted poor behavior while on the job I was charged with driving on a suspended DL and resisting arrest. This was a illegal arrest and common law states that resisting without violence is not a crime if done during a illegal arrest.

3.) These charges were all dropped on September 18th 2022. However shortly after they were refiled and I was maliciously prosecuted in direct and blaten disregard for my rights that are protected by the

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United States Constitution. I was acquitted of driving with a suspended DL on Feb. 7th 2023.

- 4.) I was taken to the moldy jail in Palm Beach County and held with no bond, which was a violation of my 8th Amendment right.

When the Palm Beach County jail booked and held me with no bond the Sheriff's office violated my 8th Amendment right. As no bond is clearly a bit excessive.

- 5.) Det. Mary Hansen started violating my rights on 8/8/2020, well she actually more than likely violated my rights prior to this date however I don't think I have proof of that. As this was 3 years after the start of her investigation that was useless, and approximately the time she gave me her personal number and stated how she could not continue to talk to me on her work phone any longer. And continued to lead me to believe there was a big investigation into the criminal ring that operates with impunity in that area, she also implied the federal government was involved do to the amount

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and various types of crime in that area.

6.) During this investigation Det. Hansen and D/S Vennar both wrote reports that were not truthful and contained mis-leading information, which was a violation of my rights protected by the United States Constitution.

7.) During this investigation Det. Hansen was given video evidence that I spent countless hours and days going through my surveillance cameras for evidence at her request. Early on in her investigation she was given video of another business owner and his employees (the criminals) stealing my plants. She never made a arrest and apparently she never built a bigger case like she implied. However even if she did build a case it is worthless as well, beings its been 6 years. This is another major violation of my Constitutional rights, and federally protected rights.

8.) Det. Hansen and these deputys were suppose to help my community be a better place with me, however they continued to allow the local criminals operate with impunity.

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9.) Instead these deputys joined in with the Criminal Activity, and Conspired against my rights. My rights that are suppose to be upheld by them not violated by them.

This was years of complete disregard for my Constitutional rights, That are suppose to be protected by The United States Constitution.

10.) Det. Mary Hansen and the Palm Beach County Sheriffs office violated my rights when they kept a 6 year investigation going while allowing the criminals to operate with impunity and in reality were probaly investigating me.

11.) Sheriff Ric Bradshaw owed a duty to me as his prisoner to keep me in health and free from harm, and the Sheriff is personally liable for his negligent breach of his duty in this regard. resulting in my injurys. Also The Sheriff must enforce the rights gurentted to all citizens by the Constitution of the United States. which in this case the Sheriff did not do.

This was a violation of my federally protected rights by Sheriff Ric Bradshaw.

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12.) Also I was housed in a very unsafe living condition where I was beat up and robbed by 3 inmates. Falsley imprisoning me in february of 2022 in such a unsafe living condition was a violation of my rights that are protected by the United States Constitution.

13.) When I was falsley imprisoned from September 10th 2022 to January 5th 2023 I had to be housed in SIOA for protective Custody. Being isolated in a cell 24 hours a day with stachbotrys, a toxic black mold that produces a nerotoxin that has been used in biological Warfare. This was a very unsafe living condition for me while I was being held in a little box against my will and illegally, this was a direct violation of my rights that are protected by the United States Constitution.

14.) It was also a violation of my rights that are protected by the United States Constitution.

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when Sheriff Ric Bradshaw failed to
reign in these rouge deputys and
detective.

15.) Also it was a violation of my
federally protected rights in 2022 when
I was being falsely imprisoned and a
office trailer was stolen from my property.
The deputys in district 4 told my
mother that the Palm Beach County Sheriffs
office does not help when a piece of
property is stolen from a piece of property.
They claim they are dealing with to
much unsolved fraud to help citizens
in my community who have a piece of
property stolen from a piece of property.
Even with there being photos of this
theft as well. This policy and or custom
of the Palm Beach County Sheriffs office
is a violation of my federally protected
rights.

16.) The last fact that I would
like to include in my claim is the
fact that any retaliation by any

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of the defendants for my claims
would be a direct violation of my
first Amendment right that is protected
by the United States Constitution.

Attachment 3

page 5 (injuries)

page 1 of 3

1.) Due to the events on September 10th 2022 I was taken to Delray Medical Center where I was treated for injuries to my arms, legs, and back. The cops who violated my rights also needed medical clearance to illegally take me to the jail. From September 10th 2022 to January 5th 2023 when I was being falsely imprisoned with no bond in a mold infested unit. This has caused a major shortness in breath, which makes every day life kinda difficult, and any future medical expenses that arise from stachbotrys a toxic black mold that produces neurotoxins that have been used in biological warfare are still unknown.

2.) When I was assaulted in february of 2022 the first time I was falsely imprisoned I had large cuts on my eye that was swollen shut. I recieved a semi-private cell in isolation as treatment for my injuries.

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3.) Also I have suffered and continue to suffer a immense amount of emotional distress on a daily basis, for the last few years, due to these deputys and detectives actions. The way they do or do not do there jobs causes me alot of pain and suffering repeatedly on a daily basis.

4.) The missed opportunitys and loses and set backs I have suffered and continue to suffer due to these violations of my federally protected rights still haunt me on a daily basis. I do not know of a remedy for these problems that seem to plague my life at this time.

5.) The enormous amount of setbacks and decline in quality of my life that are a direct result of these deputys and this detectives repeated poor decisions, and the lack of quality supervision to prevent this type of thing from happening can not be fixed.

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6.) Also I would assume that due to these repeated actions that I have either PTSD or C-PTSD and will suffer from this for the rest of my natural life. The reason I say assume is due to the fact that I have no funds to pay a professional to speak to me about all these tragic events that I have suffered due to these repeated violations of my federally protected rights.

7.) my business that my father started over 40 years ago was completely destroyed throughout all these horrible and tragic events.

I also was treated for injuries to my arms, legs, and back due to the events on Sept. 10th 2022. These injuries still bother me a year later and I'm unsure how long the pain will last. The cops have photos of my immense injuries at booking.

Attachment 4A

page 5 v Relief

page 1 of 2

1.) I would like ALL of my constitutional rights to be restored so I can try to move forward with my life in a meaningful way. I only see this as being fair after all the pain and suffering due to a direct and blatant disregard for the rights that have not already been stripped away from me and repeatedly attacked.

2.) Also to try to help justice be served, and to try my best to see a positive and meaningful change in my community I would like 50,000,000.00 dollars. Due to all of the immense amount of pain and suffering I have endured and continue to endure on a daily basis. All of the problems that currently effect my life in a negative way are a direct side-effect of my rights being repeatedly violated by multiple defendants.

page 2 of 2

3.) Since the way our justice system works the punishment must fit the crime, and also deter future illegal conduct of its type, this is how I seek to see justice is served.

4.) I would also like for the Palm Beach County Sheriff's office and Sheriff Ric Bradshaw to make sure my community is free from corruption, that is if that is even possible at this point.

5.) Also if any information or data has been collected on me, or from my business locations during this useless and illegal investigation by det. Hansen I would like to receive that data as well. The motives of det. Hansen's investigation are still unknown to me at this time. Clearly it was not what I thought. Also if any data was collected from any of my electronic devices I would also like that data as well.